

[Attorney list on signature page]

UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF CALIFORNIA,

SAN JOSE DIVISION **\*E-FILED - 9/12/07\***

HYNIX SEMICONDUCTOR INC.; HYNIX  
SEMICONDUCTOR AMERICA, INC.; HYNIX  
SEMICONDUCTOR U.K. LTD.; and HYNIX  
SEMICONDUCTOR DEUTSCHLAND GmbH,

Plaintiff,

vs.

RAMBUS INC.,  
Defendant.

CASE NO. CV 00-20905 RMW

**[] ORDER REGARDING  
PRODUCTION OF MATERIALS  
SUBJECT TO PRIVILEGE PIERCING  
ORDERS IN RELATED CASES**

RAMBUS INC.,

Plaintiff,

v.

HYNIX SEMICONDUCTOR INC., HYNIX  
SEMICONDUCTOR AMERICA INC., HYNIX  
SEMICONDUCTOR MANUFACTURING  
AMERICA INC.,

SAMSUNG ELECTRONICS CO., LTD.,  
SAMSUNG ELECTRONICS AMERICA, INC.,  
SAMSUNG SEMICONDUCTOR, INC.,  
SAMSUNG AUSTIN SEMICONDUCTOR,  
L.P.,

NANYA TECHNOLOGY CORPORATION,  
NANYA TECHNOLOGY CORPORATION  
U.S.A.,

Defendants.

CASE NO. C 05-00334 RMW

1 RAMBUS INC.,

CASE NO. C 05 02298 RMW

2 Plaintiff,

3 v.

4 SAMSUNG ELECTRONICS CO., LTD.,  
5 SAMSUNG ELECTRONICS AMERICA, INC.,  
6 SAMSUNG SEMICONDUCTOR, INC.,  
7 SAMSUNG AUSTIN SEMICONDUCTOR,  
L.P.,

8 Defendants.

9 RAMBUS INC.,

CASE NO. C 06-00244 RMW

10 Plaintiff,

11 v.

12 MICRON TECHNOLOGY, INC., and MICRON  
13 SEMICONDUCTOR PRODUCTS, INC.,

14 Defendants.

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17 At the case management conference before the Court on August 3, 2007, Hynix  
18 Semiconductor Inc., Hynix Semiconductor America, Inc., Hynix Semiconductor U.K. Ltd., Hynix  
19 Semiconductor Deutschland GmbH, and Hynix Semiconductor Manufacturing America Inc.  
20 (collectively, "Hynix"), Samsung Electronics Co., Ltd., Samsung Electronics America, Inc.,  
21 Samsung Semiconductor, Inc., and Samsung Austin Semiconductor, L.P. (collectively,  
22 "Samsung,"), Nanya Technology Corporation and Nanya Technology Corporation U.S.A.  
23 (collectively, "Nanya"), and Micron Technology, Inc. and Micron Semiconductor Products, Inc.  
24 (collectively, "Micron") requested that the Court order Rambus Inc. ("Rambus") to produce all  
25 materials that Rambus has been ordered to produce pursuant to privilege piercing orders in *Hynix*  
26 *Semiconductor, Inc. et al. v. Rambus Inc.*, Civ. A. No. 00-20905 (N.D. Cal. filed Aug. 29, 2000)  
27 ("Hynix I case") and *Micron Technology, Inc. v. Rambus Inc.*, Civ. A. No. 00-792 (D. Del filed  
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1 Aug. 28, 2000) (“Micron Delaware case”) to the parties adverse to Rambus in each of the above-  
2 captioned cases to the extent it had not already done so. Rambus opposed this request. Having  
3 considered the parties’ arguments and good cause appearing,

4 IT IS HEREBY ORDERED that:

5 1. Rambus shall produce all materials that Rambus has been ordered to  
6 produce pursuant to privilege piercing orders in the Hynix I case to Hynix, Samsung, Nanya and  
7 Micron in each of the above-captioned cases to the extent it has not already done so, including  
8 without limitation the materials subject to the Court’s Orders dated February 26, 2004, January  
9 31, 2005, February 28, 2005, August 26, 2005, October 3, 2005, October 19, 2005, and October  
10 20, 2005, and all discovery and testimony taken in connection with such materials, including  
11 without limitation documents, interrogatory responses, deposition testimony and exhibits, trial  
12 testimony and exhibits, and declarations.


13 2. Rambus shall produce all materials that Rambus has been ordered to  
14 produce pursuant to privilege piercing orders in the Micron Delaware case to Hynix, Samsung,  
15 Nanya and Micron in each of the above-captioned cases to the extent it has not already done so,  
16 including without limitation the materials subject to the Court’s Orders dated May 16, 2001,  
17 February 10, 2006, and June 15, 2006, and all discovery and testimony taken in connection with  
18 such materials, including without limitation documents, interrogatory responses, deposition  
19 testimony and exhibits, trial testimony and exhibits, and declarations.

20 3. Rambus shall produce the materials identified above within 15 business  
21 days of entry of this Order without the need for further requests by Hynix, Samsung, Nanya or  
22 Micron.

23 4. By producing these materials in response to this Order, Rambus is not  
24 waiving any protection to which it is otherwise entitled under the attorney-client privilege or  
25 work product doctrine, and nothing in this Order shall preclude Rambus from challenging the  
26 admissibility of any documents or testimony at any trial on any basis, including without limitation  
27 on the basis of the attorney-client privilege and/or work product protection.  
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1 IT IS SO ORDERED.

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3 Dated: 9/10/07

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6 Honorable Ronald M. Whyte  
7 United States District Court Judge  
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1 **APPROVED AS TO FORM:**

2 DATED: August 20, 2007 Respectfully submitted,

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4 FOR THE MANUFACTURERS

5  
6 By /s/ Hal Barza

6 Harold A. Barza

7 William Price

7 Robert Becher

8 QUINN EMANUEL URQUHART OLIVER & HEDGES

8 865 South Figueroa Street, 10th Floor

9 Los Angeles, California 90017-2543

9  
10 Jared Bobrow

10 John D. Beynon

11 WEIL, GOTSHAL & MANGES LLP

11 Redwood Shores, CA 94065

12 Attorneys for

12 MICRON TECHNOLOGY, INC., and

13 MICRON SEMICONDUCTOR PRODUCTS, INC.

14  
15 By /s/ Anita Kadala

16 David J. Healey

16 Anita E. Kadala

17 WEIL, GOTSHAL & MANGES LLP

17 Houston, TX 77002

18 Alan J. Weinschel

19 WEIL, GOTSHAL & MANGES LLP

19 New York, NY 10153

20 Matthew D. Powers

21 Edward R. Reines

21 WEIL, GOTSHAL & MANGES LLP

22 Redwood Shores, CA 94065

23 Attorneys for

23 SAMSUNG ELECTRONICS CO., LTD.,

24 SAMSUNG ELECTRONICS AMERICA, INC.,

24 SAMSUNG SEMICONDUCTOR, INC., and

25 SAMSUNG AUSTIN SEMICONDUCTOR, L.P.

1  
2  
3 By /s/ Robert Freitas  
4 Robert E. Freitas  
5 Kai Tseng  
6 Craig R. Kaufman  
7 Denise M. Mingrone  
8 ORRICK, HERRINGTON & SUTCLIFFE LLP  
9 Menlo Park, CA 94025

10 Attorneys for  
11 NANYA TECHNOLOGY CORPORATION and NANYA  
12 TECHNOLOGY CORPORATION U.S.A.

13 By /s/ Theodore G. Brown  
14 Theodore G. Brown, III  
15 TOWNSEND and TOWNSEND and CREW LLP  
16 379 Lytton Avenue  
17 Palo Alto, California 94301

18 Attorneys for  
19 HYNIX SEMICONDUCTOR INC., HYNIX SEMICONDUCTOR  
20 AMERICA INC., HYNIX SEMICONDUCTOR  
21 MANUFACTURING AMERICA INC., HYNIX  
22 SEMICONDUCTOR U.K. LTD., and HYNIX SEMICONDUCTOR  
23 DEUTSCHLAND GmbH

24 **APPROVED ONLY AS TO FORM AND NOT AS TO CONTENT:**

25 DATED: August 20, 2007

26 FOR RAMBUS INC.

27 By /s/ Carolyn Luedtke  
28 MUNGER, TOLLES & OLSON LLP  
560 Mission Street, 27<sup>th</sup> Floor  
San Francisco, CA 94105

Attorneys for  
RAMBUS INC.